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Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	NO. CR 19-226 RS
	)	
Plaintiff,	)	STIPULATION AND [PROPOSED]
	)	ORDER EXCLUDING SPEEDY TRIAL
v.	)	TIME FROM JUNE 17, 2019 UNTIL
	)	SEPTEMBER 17, 2019
LORENZO LEE,	)	
a/k/a "O.G.,"	)	
JEFFREY MCCOY,	)	
ANTHONY BROWN,	)	
a/k/a "Ant Man,"	)	
DESHAWNTE GAMBOA,	)	
DEBORAH POLK,	)	
EVAN MARTINEZ-DIAZ,	)	
MAGO AGUILAR-PACHECO,	)	
CESAR ALVARADO,	)	
JESSE LOPEZ, III,	)	
JOSE DELGADILLO,	)	
a/k/a "Tepa,"	)	
MARCO DELGADILLO,	)	
a/k/a "Tonio,"	)	
LUIS TORRES-GARCIA,	)	
a/k/a "Guero," and	)	
TIMOTHY PEOPLES,	)	
a/k/a "Tee,"	)	
	)	
Defendants.	)	

1 Subject to this Court's confirming order, the defendants, by and through undersigned counsel,  
 2 and the United States, by and through Assistant United States Attorney Casey Boome, hereby stipulate  
 3 and agree as follows:

4 At a status conference before this Court on June 18, 2019, government counsel and counsel for  
 5 the defendants agreed that time should be excluded under the Speedy Trial Act to allow for effective  
 6 preparation of defense counsel, including reviewing voluminous discovery to be provided by the  
 7 government in the immediate future, as soon as the parties have identified a discovery coordinator. At  
 8 the request of the parties and in consultation with the courtroom deputy, the Court continued the matter  
 9 to September 17, 2019 at 2:00 p.m. The parties, therefore, now jointly request that the time from June  
 10 18, 2019 to September 17, 2019 be excluded from computation under the Speedy Trial Act. The parties  
 11 agree that, for the reasons set forth above, the ends of justice served by excluding the time from June 18,  
 12 2019 to September 17, 2019 outweigh the best interests of the public and the defendants in a speedy  
 13 trial. *See* 18 U.S.C. § 3161(h)(7)(A). The parties further agree that an excludable continuance is  
 14 necessary for the effective preparation of counsel, taking into account the exercise of due diligence. *See*  
 15 18 U.S.C. § 3161(h)(7)(B)(iv).

16 As such, the parties respectfully request that the Court order that the time from June 18, 2019 to  
 17 September 17, 2019 be excluded from computation under the Speedy Trial Act.

18 DATED: June 20, 2019

Respectfully submitted,

19 DAVID L. ANDERSON  
 20 United States Attorney

21 /s/ Casey Boome  
 22 CASEY BOOME  
 Assistant United States Attorney

23 /s/ with permission  
 24 ETHAN ATTICUS BALOGH  
 Attorney for Marco Delgadillo

25 /s/ with permission  
 26 RICHARD B. MAZER  
 Attorney for Lorenzo Lee

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/s/ with permission  
CANDIS MITCHELL  
Attorney for Anthony Brown

/s/ with permission  
SCOTT A. SUGARMAN  
Attorney for Timothy Peoples

/s/ with permission  
JAMES SCOTT THOMPSON  
Attorney for Deshawnte Gamboa

/s/ with permission  
JESSICA WALSH  
Attorney for Jose Delgadillo

/s/ with permission  
RANDY SUE POLLOCK  
Attorney for Deborah Polk

**[PROPOSED] ORDER**

Based upon the facts set forth in the stipulation of the parties, the Court finds that failing to exclude the time from June 18, 2019 to September 17, 2019 would unreasonably deny defense counsel and the defendants the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from June 18, 2019 to September 17, 2019 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendants in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from June 18, 2019 to September 17, 2019 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. §§ 3161(h)(7)(A), (B)(iv).

Dated: \_\_\_\_\_

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HON. RICHARD SEEBORG  
United States District Court Judge